

DOCKET NO. 2020-1-E

PETITION TO INTERVENE

2. S.C. Code Ann. Section 58-27-865 provides the procedure for review and recovery of fuel costs and of “incremental and avoided costs of distributed energy resource programs and net metering as authorized and approved under Chapters 39 and 40, Title 58[, which] shall be allocated and recovered from customers under a separate distributed energy component of the overall fuel factor that shall be allocated and

recovered based on the same method that is used by the utility to allocate and recover variable environmental costs.”

3. S.C. Code Section 58-39-140 of the South Carolina Distributed Energy Resource Act and Commission Order 2015-194 allow the Company to recover certain reasonable and prudent costs incurred to implement approved distributed energy resource (“DER”) programs, including certain costs related to net energy metering (“NEM”). Recoverable costs are capped in Section 58-39-150 “[f]or the protection of consumers and to ensure that the cost of DER programs do not exceed a reasonable threshold.”

4. Pursuant to the South Carolina Distributed Energy Resource Act, the Energy Freedom Act, and the Settlement Agreement approved by the Commission in Order No. 2015-194, Docket No. 2014-246-E, the Company will also compute and update annually the “costs and benefits of net metering and the required amount of the DER NEM Incentive” coincident in time with the Utility’s filing under the fuel clause. Under the Energy Freedom Act and Order No. 2015-194, the DER NEM incentive will apply to customer-generators who apply for net metering prior to June 1, 2021, and will be available to these customers until May 31, 2029.

5. This Petition to Intervene is timely filed, as the Commission has established an intervention deadline of March 23, 2020 for this proceeding.

6. The South Carolina Coastal Conservation League (“CCL”) is a nonprofit organization whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in their communities by working with individuals, businesses and government to ensure balanced solutions. CCL supports the development of energy policy that is in the public interest of South Carolinians. CCL has

members from across the State, including members who receive electricity service from Duke Energy Progress, LLC and will be impacted by the decisions made in this proceeding regarding renewable energy and the recovery of fuel costs and incremental and avoided costs of distributed energy resource programs and net metering. The address of CCL's main office is 131 Spring Street, Charleston, SC 29403.

7. Southern Alliance for Clean Energy ("SACE") is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South's energy needs. Like CCL, SACE has members from across the State, including members who receive electricity service from the Company and will be impacted by the decisions made in this proceeding regarding renewable energy and the recovery of fuel costs and incremental and avoided costs of distributed energy resource programs and net metering. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina.

8. The Conservation Groups have participated as intervenors in multiple Commission proceedings relating to the implementation of the South Carolina Distributed Energy Resource Act, including Docket Nos. 2014-246-E, 2015-53-E, 2015-54-E, 2015-55-E, 2015-203-E, 2015-204-E, 2015-205-E, 2015-362-E, 2016-1-E, 2016-2-E, 2016-3-E, 2017-1-E, 2017-2-E, 2017-3-E, 2018-1-E, 2018-2-E, 2018-3-E, 2019-2-E, and 2020-2-E.

9. The Conservation Groups and their members have direct and substantial interests that will be impacted by the decisions made in this proceeding regarding renewable energy and the recovery of fuel costs and incremental and avoided costs of distributed energy resource programs and net metering, and their interests cannot be adequately addressed by any other party. The Conservation Groups' position in this proceeding is to advocate for a full and proper valuation of NEM generation and appropriate cost recovery consistent with the Settlement Agreement approved in Docket 2014-246-E that will accurately reflect and support an effective and diversified portfolio of distributed energy resources and lead to cleaner, safer, and healthier communities for all South Carolinians. The Conservation Groups seek to ensure that the Company's fuel purchasing practices and policies result in the lowest reasonable costs to customers, and that the Company's fuel costs are just and reasonable. The Conservation Groups' support for these policies and involvement in this proceeding will promote their members' interests as well as the broader public interest. Petitioning to intervene in this proceeding is also consistent with the Commission's policies encouraging maximum public participation in the issues before it.

10. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Conservation Groups are represented by counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 23rd day of March, 2020.

s/J. Blanding Holman, IV

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Southern Alliance for Clean Energy*

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2020-1-E

In re: Annual Review of Base Rates
for Fuel Costs of Duke Energy
Progress, LLC

CERTIFICATE OF SERVICE

I certify that the following persons have been served with one (1) copy of the Petition to Intervene Filed on behalf of the South Carolina Coastal Conservation League and Sothern Alliance for Clean Energy by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

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March 23, 2020

/s/ Emily E. Selden